

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS ON :  
SEPTEMBER 11, 2001 : 03-MDL-1570 (GBD)(SN)

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**This Document Relates To:**

*Patricia Ryan, Individually as Spouse and as Personal Representative of the Estate of John J. Ryan, deceased; Kristen Ryan, Individually and as Surviving Child of John J. Ryan, deceased; Laura Ryan, individually and as Surviving Child of John J. Ryan, deceased; and Colin Ryan, Individually as Surviving Child of John J. Ryan, deceased only in the cases of Ashton, et al. v. al Qaeda Islamic Army, et al., Case No. 02-cv-6977 (GBD)(SN); Bauer, et al. v. al Qaeda Islamic Army, et al., Case No. 02-cv-7236 (GBD)(SN); and Ashton, et al. v. Kingdom of Saudi Arabia, Case No.: 17-cv-02003 (GBD)(SN)*

**MOTION TO SUBSTITUTE COUNSEL**

COME NOW, Patricia Ryan, individually as spouse and as Personal Representative of the Estate of John J. Ryan, deceased; Kristen Ryan, individually as surviving child of John J. Ryan, deceased; Laura Ryan, individually as surviving child of John J. Ryan, deceased; and Colin Ryan, individually as surviving child of John J. Ryan, deceased (“the Ryan Plaintiffs”) Plaintiffs in *Ashton, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-6977 (GBD)(SN); *Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-7236 (GBD)(SN); and *Ashton, et al. v. Kingdom of Saudi Arabia*, Case No.: 17-cv-02003 (GBD)(SN), and file this Motion to Substitute Counsel. As grounds for said Motion, the Ryan Plaintiffs state as follows:

1. The Ryan Plaintiffs were represented by Thea Capone and Michel F. Baumeister of Baumeister & Samuels, P.C. (“Baumeister & Samuels”). On March 22, 2019, by email, Baumeister & Samuels informed the Ryan Plaintiffs that they should seek new counsel.
2. The Ryan Plaintiffs have retained Dennis G. Pantazis of Wiggins Childs Pantazis Fisher Goldfarb LLC to represent them in this matter.

3. The Ryan Plaintiffs request the Court to substitute Dennis G. Pantazis as attorney of record as to the Ryan Plaintiffs *only*.

4. The Ryan Plaintiffs and Dennis G. Pantazis consent to the substitution of counsel as requested herein (signed Consents attached hereto as Exhibit A).

5. The parties anticipate after substitution of counsel is granted, they will move the Court to separate the Ryan Plaintiffs into a separate case.

**WHEREFORE, PREMISES CONSIDERED**, Patricia Ryan, individually as spouse and as Personal Representative of the Estate of John J. Ryan, deceased; Kristen Ryan, individually as surviving child of John J. Ryan, deceased; Laura Ryan, individually as surviving child of John J. Ryan, deceased; and Colin Ryan, individually as surviving child of John J. Ryan, deceased, pray that this Honorable Court enter an Order substituting Dennis G. Pantazis of Wiggins Childs Pantazis Fisher Goldfarb LLC as attorney of record for the Ryan Plaintiffs *only* in *Ashton, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-6977 (GBD)(SN); *Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-7236 (GBD)(SN); and *Ashton, et al. v. Kingdom of Saudi Arabia*, Case No.: 17-cv-02003 (GBD)(SN).

RESPECTFULLY SUBMITTED,

/s/ Dennis G. Pantazis  
Dennis G. Pantazis

OF COUNSEL:  
WIGGINS CHILDS PANTAZIS  
FISHER GOLDFARB LLC  
The Kress Building  
301 Nineteenth Street North  
Birmingham, Alabama 35203  
Telephone: (205) 314-0531  
Facsimile: (205) 314-0731  
Email: dgp@wigginschilds.com

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS ON :  
SEPTEMBER 11, 2001 : 03-MDL-1570 (GBD)(SN)

**This Document Relates To:**

*Ashton, et al. v. al Qaeda Islamic Army, et al.*, Case No.: 02-cv-06977 (GBD) (SN)

*Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No.: 02-cv-07236 (GBD) (SN)

*Ashton, et al. v. Kingdom of Saudi Arabia, et al.*, Case No.: 17-cv-02003 (GBD) (SN)

**CONSENT ORDER GRANTING SUBSTITUTION OF ATTORNEY**

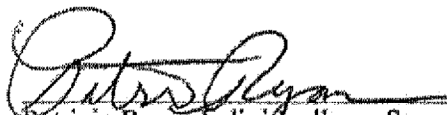
Notice is hereby given that, subject to approval by the Court, Patricia Ryan, individually as spouse and as Personal Representative of the Estate of John J. Ryan, deceased, substitutes Dennis G. Pantazis of Wiggins Childs Pantazis Fisher Goldfarb LLC, as counsel of record in place of Baumeister & Samuels, P.C.

Contact information for new counsel, Dennis G. Pantazis, is as follows:

Wiggins Childs Pantazis Fisher Goldfarb LLC  
The Kress Building  
301 Nineteenth Street North  
Birmingham, Alabama 35203  
Telephone: (205) 314-0531  
Facsimile: (205) 314-0731  
Email: dgp@wigginschilds.com

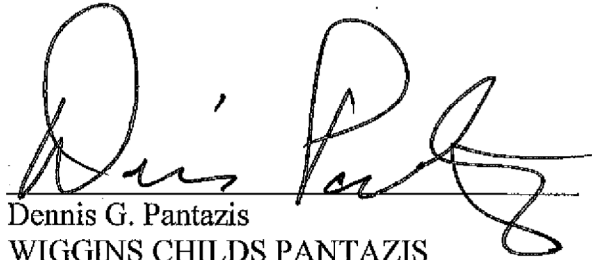
I, Patricia Ryan, individually as spouse and as Personal Representative of the Estate of John J. Ryan, deceased, hereby consent to the above substitution of counsel.

Date: 8/20/19

  
Patricia Ryan, Individually as Spouse and as  
Personal Representative of the Estate of  
John J. Ryan, deceased

I, Dennis G. Pantazis, hereby consent to the above substitution of counsel as to plaintiffs  
**Patricia Ryan, individually as spouse and as Personal Representative of the Estate of John  
J. Ryan, deceased.**

Date: 9/20/19



Dennis G. Pantazis  
WIGGINS CHILDS PANTAZIS  
FISHER GOLDFARB LLC  
The Kress Building  
301 Nineteenth Street North  
Birmingham, Alabama 35203  
Telephone: (205) 314-0531  
Facsimile: (205) 314-0731  
Email: [dgp@wigginschilds.com](mailto:dgp@wigginschilds.com)

The substitution of attorney as to plaintiffs **Patricia Ryan, individually as spouse and as  
Personal Representative of the Estate of John J. Ryan, deceased** is hereby approved and so  
**ORDERED.**

Date: \_\_\_\_\_

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

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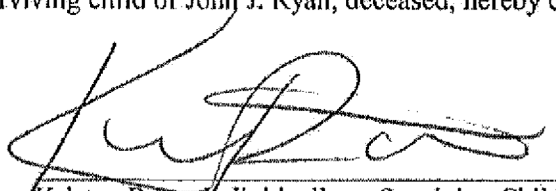
Notice is hereby given that, subject to approval by the Court, Kristen Ryan, individually as surviving child of John J. Ryan, deceased, substitutes Dennis G. Pantazis of Wiggins Childs Pantazis Fisher Goldfarb LLC, as counsel of record in place of Baumeister & Samuels, P.C.

Contact information for new counsel, Dennis G. Pantazis, is as follows:

Wiggins Childs Pantazis Fisher Goldfarb LLC  
The Kress Building  
301 Nineteenth Street North  
Birmingham, Alabama 35203  
Telephone: (205) 314-0531  
Facsimile: (205) 314-0731  
Email: dgp@wigginschilds.com

I, Kristen Ryan, individually as surviving child of John J. Ryan, deceased, hereby consent to the above substitution of counsel.

Date: 8/20/19

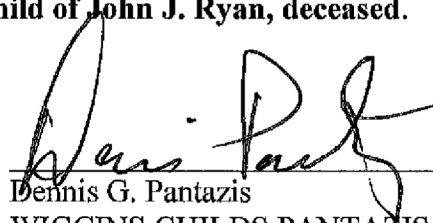
  
\_\_\_\_\_  
Kristen Ryan, Individually as Surviving Child  
of John J. Ryan, deceased

I, Dennis G. Pantazis, hereby consent to the above substitution of counsel as to plaintiff

**Kristen Ryan, individually as surviving child of John J. Ryan, deceased.**

Date: \_\_\_\_\_

9/20/19



Dennis G. Pantazis  
WIGGINS CHILDS PANTAZIS  
FISHER GOLDFARB LLC  
The Kress Building  
301 Nineteenth Street North  
Birmingham, Alabama 35203  
Telephone: (205) 314-0531  
Facsimile: (205) 314-0731  
Email: [dgp@wigginschilds.com](mailto:dgp@wigginschilds.com)

The substitution of attorney as to plaintiff **Kristen Ryan, individually as surviving child of John J. Ryan, deceased** is hereby approved and so **ORDERED**.

Date: \_\_\_\_\_

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

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**CONSENT ORDER GRANTING SUBSTITUTION OF ATTORNEY**

Notice is hereby given that, subject to approval by the Court, Laura Ryan, individually as surviving child of John J. Ryan, deceased, substitutes Dennis G. Pantazis of Wiggins Childs Pantazis Fisher Goldfarb LLC, as counsel of record in place of Baumeister & Samuels, P.C.

Contact information for new counsel, Dennis G. Pantazis, is as follows:

Wiggins Childs Pantazis Fisher Goldfarb LLC  
The Kress Building  
301 Nineteenth Street North  
Birmingham, Alabama 35203  
Telephone: (205) 314-0531  
Facsimile: (205) 314-0731  
Email: [dgp@wigginschilds.com](mailto:dgp@wigginschilds.com)

I, Laura Ryan, individually as surviving child of John J. Ryan, deceased, hereby consent to the above substitution of counsel.

Date: \_\_\_\_\_



\_\_\_\_\_  
Laura Ryan, Individually as Surviving Child  
of John J. Ryan, deceased

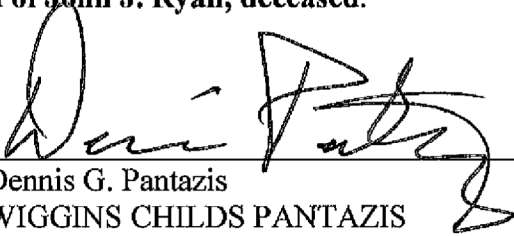


I, Dennis G. Pantazis, hereby consent to the above substitution of counsel as to plaintiff

**Laura Ryan, individually as surviving child of John J. Ryan, deceased.**

Date: \_\_\_\_\_

9/20/19



Dennis G. Pantazis  
WIGGINS CHILDS PANTAZIS  
FISHER GOLDFARB LLC  
The Kress Building  
301 Nineteenth Street North  
Birmingham, Alabama 35203  
Telephone: (205) 314-0531  
Facsimile: (205) 314-0731  
Email: [dgp@wigginschilds.com](mailto:dgp@wigginschilds.com)

The substitution of attorney as to plaintiff **Laura Ryan, individually as surviving child of John J. Ryan, deceased** is hereby approved and so **ORDERED**.

Date: \_\_\_\_\_

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

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**CONSENT ORDER GRANTING SUBSTITUTION OF ATTORNEY**


Notice is hereby given that, subject to approval by the Court, Colin Ryan, individually as surviving child of John J. Ryan, deceased, substitutes Dennis G. Pantazis of Wiggins Childs Pantazis Fisher Goldfarb LLC, as counsel of record in place of Baumeister & Samuels, P.C.

Contact information for new counsel, Dennis G. Pantazis, is as follows:

Wiggins Childs Pantazis Fisher Goldfarb LLC  
The Kress Building  
301 Nineteenth Street North  
Birmingham, Alabama 35203  
Telephone: (205) 314-0531  
Facsimile: (205) 314-0731  
Email: [dgp@wigginschilds.com](mailto:dgp@wigginschilds.com)

I, Colin Ryan, individually as surviving child of John J. Ryan, deceased, hereby consent to the above substitution of counsel.

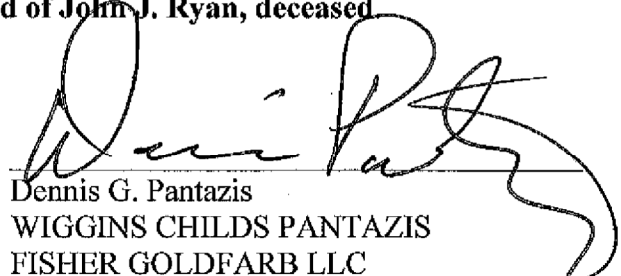
Date: 8/20/2019

  
\_\_\_\_\_  
Colin Ryan, Individually as Surviving Child  
of John J. Ryan, deceased

I, Dennis G. Pantazis, hereby consent to the above substitution of counsel as to plaintiff

**Colin Ryan, individually as surviving child of John J. Ryan, deceased**

Date: 9/20/19

  
Dennis G. Pantazis  
WIGGINS CHILDS PANTAZIS  
FISHER GOLDFARB LLC  
The Kress Building  
301 Nineteenth Street North  
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Telephone: (205) 314-0531  
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Email: [dgp@wigginschilds.com](mailto:dgp@wigginschilds.com)

The substitution of attorney as to plaintiff **Colin Ryan, individually as surviving child of John J. Ryan, deceased** is hereby approved and so **ORDERED**.

Date: \_\_\_\_\_

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE